

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JAMIE LEE ANDREWS, as
Surviving Spouse of
MICAHA LEE ANDREWS, Deceased,
and JAMIE LEE ANDREWS, as
Administrator of the Estate of MICAHA
LEE ANDREWS, Deceased,

Plaintiff,

v.

MAZDA MOTOR CORPORATION,
MAZDA MOTOR OF AMERICA,
INC., AUTOLIV JAPAN, LTD., and
JOHN DOES 1-5,

Defendants.

CIVIL ACTION FILE

NUMBER 1:14-cv-3432-WSD

**AMENDED JOINT STIPULATION
AND [PROPOSED] ORDER/COMMISSION
FOR DEPOSITIONS TO BE TAKEN IN JAPAN**

JOINT STIPULATION

On April 5, 2016, this Court entered a Commission permitting Plaintiff Jaime Andrews to take depositions of certain witnesses from Mazda Motor Corporation on or about June 15, 2016, at the U.S. Consulate in Osaka, Japan. The parties submit this amended joint stipulation to add four names to the Commission: Brandy Renee Stull, Jennifer Buck, Bronwen Ruth Williams, and Marc Antoine

Joseph Yves Astier. Ms. Stull will be the court reporter at the deposition. Ms. Buck and Ms. Williams will be alternate court reporters in the event of an emergency or cancelation of the primary court reporter. Mr. Astier will be the videographer. All other names in the amended Commission are unchanged from the Court's original April 5, 2016 Commission.

Andrews, Mazda, and Autoliv Japan, Ltd. hereby submit and jointly stipulate to the following Proposed Order/Commission for Depositions to be taken in Japan.

This Joint Stipulation is made this 27th day of May, 2016.

FOR THE PLAINTIFF JAMIE ANDREWS

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**TO ANY CONSUL OR VICE CONSUL OF THE UNITED STATES
ASSIGNED TO OSAKA, JAPAN**

Upon the application of Plaintiff Jamie Andrews, and pursuant to Article 17
of the United States–Japan Consular Convention,

IT IS ORDERED THAT the depositions of the following witnesses be
taken at the United States Consulate in Osaka, Japan commencing on or about June
15, 2016 at 8:30 a.m. and terminating on or about June 16, 2016 at 4:30 p.m., and
that any documentary exhibits in connection therewith be marked:

Federal Rule of Civil Procedure 30(b)(6) Deposition of Mazda Motor Corporation

Mazda Motor Corporation
3-1 Shinchu, Fuchu-cho, Aki-gun
Hiroshima, 730-8670, Japan

Potential witnesses for the Rule (30)(b)(6) deposition of Mazda Motor Corporation include the following:

Mitsutoshi Yamanishi, Staff Manager, Seats & Occupant Protection System Development Group, Interior & Exterior Components Development Department.

Counsel for Defendant Mazda Motor Corporation who will participate in said depositions are C. Bradford Marsh and Ashley W. Broach. In addition, Charles Kim will attend on behalf of Mazda Motor Corporation.


Counsel for Plaintiff Jamie Andrews who will participate in said depositions is Tedra L. Cannella. In addition, Cathy M. Huff and Yoshi Reitz may attend on behalf of Ms. Andrews.

Counsel for Defendant Autoliv Japan, Ltd. who will participate in said depositions are Douglas Scribner and Jenny A. Mendelsohn.

The court reporter for the depositions will be Brandy Renee Stull, and court reporters Jennifer Buck and Bronwen Ruth Williams may also attend. The videographer for the deposition will be Marc Antoine Joseph Yves Astier.

Please cause the testimony of said witnesses to be recorded by video and reduced to writing; the depositions to be signed by said witnesses; said deposition testimony to be annexed to your Commission and closed under your seal; and the return of these materials to this Court with all convenient speed.

WITNESS, the Honorable William S. Duffey, Jr., United States District Judge of the United States District Court for the Northern District of Georgia, this 1st day of June, 2016.



WILLIAM S. DUFFEY, JR.
UNITED STATES DISTRICT JUDGE

I hereby certify that the signature above is that of the Honorable William S. Duffey, Jr., United States District Judge of the United States District Court for the Northern District of Georgia.

James N. Hatten, Clerk of Court

By: s/Benjamin G. Thurman
Deputy Clerk

Seal:

